

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HARTFORD FIRE INSURANCE COMPANY

a/s/o Lycee Francais de New York,

Plaintiff,

-against-

CIVIL ACTION NO.
CV 07-4084 (SHS) (AJP)

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES, INC.,
F.J. SCIAME CONSTRUCTION CO., INC., POLSHEK
PARTNERSHIP, LLP AND CANTOR SEINUK GROUP,
INC.,

Defendants.
-----X

**AUTOMATIC DISCLOSURE STATEMENT OF
DEFENDANT LANGAN ENGINEERING & ENVIRONMENTAL SERVICES, INC.**

Defendant, Langan Engineering & Environmental Services ("Langan"), by its attorneys, Sedgwick, Detert, Moran & Arnold LLP, hereby provides automatic disclosure pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure as follows:

I. INTRODUCTORY STATEMENT

The following disclosures are made based on the information reasonably available to Langan as of the date of this statement. By making these disclosures, Langan does not represent that it is identifying every document, tangible thing, or witness possibly relevant to this lawsuit, nor does Langan waive its right to object to the production of any document or tangible thing on the basis of any privilege, the work product doctrine, relevancy, undue burden, or any other valid objection. Rather, Langan's disclosures represent its good faith effort to identify information subject to the disclosure requirements of Rule 26(a)(1).

Finally, Langan's disclosures are made without in any way waiving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground, to the use of any such information for any purpose, in whole or in part, in any subsequent stage or proceeding in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery proceeding involving or relating to the subject matter of these disclosures.

All of the disclosures set forth below are made subject to the above comments and qualifications.

II. DISCLOSURES

Subject to the above Introductory Statement, Langan discloses the following:

(A) The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

RESPONSE

Subject to its identification of additional individuals in the course of its continuing investigation with respect to this litigation, Langan is aware of the following individuals or category of individuals who may have discoverable information:

1. Certain project engineers, employees and principals of Langan including:
 - i. Andrew J. Cancia
21 Penn Plaza
360 West 31st Street, 8th Floor
New York, New York 10001
(212) 479-5400

- ii. Brian Ladd
21 Penn Plaza
360 West 31st Street, 8th Floor
New York, New York 10001
(212) 479-5400
- 2. Certain officers, directors, agents and/or employees of Mayrich Construction Corporation, whose identity is presently not known to Langan.
- 3. Certain officers, directors, agents and/or employees of F.J. Sciame Construction Company, whose identity is presently not known to Langan.
- 4. Certain officers, directors, agents, partners and/or employees of Polshek Partnership, LLP, whose identity is presently not known to Langan.
- 5. Certain officers, directors, agents and/or employees of Cantor Seinuk Group, Inc., whose identity is presently not known to Langan.
- 6. Certain officers, directors, agents and/or employees of Lycee Francais de New York, Inc., whose identity is presently not known to Langan.
- 7. Certain officers, directors, agents and/or employees of Albanese Development Corporation, whose identity is presently not known to Langan.

(B) A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party that the disclosing party may use to support its claims or defenses unless solely for impeachment

RESPONSE

Subject to its identification of additional documents in the course of its continuing investigation with respect to this litigation, Langan discloses that the documents in its custody and control which may bear significantly on Langan's defenses and claims are:

1. certain relevant documents, including, but not limited to contracts, proposals, correspondence, reports, work logs, diagrams, schematics and photographs, pertaining to the Lycee Francais de New York construction project;

Said documents are available for inspection and copying at the offices of Sedgwick, Detert, Moran & Arnold LLP, 125 Broad Street, 39th Floor, New York, New York.

(C) A Computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

RESPONSE

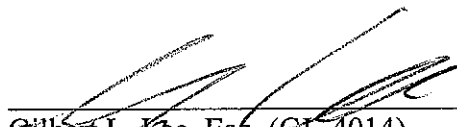
Not Applicable.

(D) For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

RESPONSE

A copy of Comprehensive General Liability Insurance Policy Number 0325892 with a policy period from September 1, 2005, until September 1, 2006, issued to Langan Engineering & Environmental Services, Inc. is available for inspection and copying at the offices of Sedgwick, Detert, Moran & Arnold LLP, 125 Broad Street, 39th Floor, New York, New York.

Dated: New York, New York
August 7, 2007



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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the attached **AUTOMATIC DISCLOSURE STATEMENT OF PLAINTIFF LANGAN SPECIALTY INSURANCE COMPANY** was served via ECF and regular mail on August 7, 2007, upon:

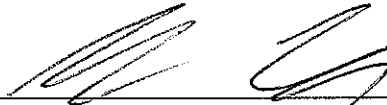
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